

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK

PAMELA JONES,

Plaintiff,

-against-

**LYNCH SCHWAB, PLLC and GERALD S.
GOOD, ESQ.,**

Defendants.

NOTICE OF MOTION

Civil Action No.
1:11-cv-0616-GLS/DRH

PLEASE TAKE NOTICE

MOTION BY:

HISCOCK & BARCLAY, LLP

Attorneys for Defendants

Office and Post Office Address

One Park Place

300 South State Street

Syracuse, New York 13202-2078

DATE, TIME AND PLACE OF HEARING:

January 17, 2013, 9:00 a.m.

United States District Court

Northern District of New York

James T. Foley United States Courthouse

445 Broadway

Albany, New York 12207

ORAL ARGUMENT:

Unless otherwise directed by the Court, oral argument will be held on January 17, 2013, before Chief Judge Gary L. Sharpe at 9:00 a.m. in the United States Courthouse in Albany, New York.

SUPPORTING PAPERS:

Declaration of Kevin M. Hayden dated December 14, 2012, with Exhibits; Declaration of Gerald S. Good, Esq., dated December 13, 2012, with Exhibits; Statement of Material Facts dated December 14, 2012;

and Memorandum of Law dated December 14, 2012.

RELIEF DEMANDED:

An Order, pursuant to Fed. R. Civ. P. 56, granting Defendants summary judgment dismissing Plaintiff's Complaint and awarding Defendants such other and further relief as the Court deems just and proper.

GROUND FOR RELIEF:

Plaintiff failed to establish that Defendants committed legal malpractice.

DEMAND FOR ANSWERING PAPERS:

Pursuant to Rule 7.1(b)(1) of the Local Rules for the United States District Court for the Northern District of New York, movant demands that any opposing papers be served on the undersigned attorneys no later than seventeen (17) days prior to the return date of the motion.

DATED: December 14, 2012

HISCOCK & BARCLAY, LLP

By: s/Kevin M. Hayden
Kevin M. Hayden
Bar Roll No. 514313

Attorneys for Defendants
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CERTIFICATE OF SERVICE

I hereby certify that on December 14, 2012, I filed the foregoing Notice of Motion with the Clerk of the Court via the CM/ECF System which sent notification of such filing to the following attorney for Plaintiff:

Stephen R. Krawitz, Esq.
Attorney for Plaintiff
271 Madison Avenue
Suite 200
New York, New York 10016
Telephone: (212) 682-0707
E-mail: skrawitz@aol.com

s/Kevin M. Hayden
Kevin M. Hayden
Bar Roll No. 514313